

Exhibit B

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

**TIFFANY DAVIS,**

§

**Plaintiff,**

§

**v.**

§

**Case No. 1:23-cv-131-RP**

**ALOMEGA HOME HEALTH CARE,  
LLC AND ALVERNA MCCULLOUGH,  
INDIVIDUALLY,**

§

**Defendants.**

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**DECLARATION OF SHUKRI ROBINSON**

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I, Shukri Robinson, declare as follows:

1. My name is Shukri Robinson. I am over the age of eighteen years, and competent to make this declaration. I make this declaration pursuant to the provisions of 28 U.S.C. Sec.1746.
2. I make this declaration based upon personal knowledge and, if sworn as a witness, could and would testify competently to the facts contained herein.
3. I am a Licensed Vocational Nurse (“LVN) and former home health nurse of Alomega Home Health Care, LLC and Alverna McCullough (“Defendants”). I worked full time for Defendants from approximately October 16, 2022 through January 16, 2023.
4. During this period of time, which is 13 weeks, I would typically work 12 hours per day, Monday through Friday, or 60 hours per week. At all times I was paid \$35.00 an hour for all hours worked.
5. 20 hours of overtime worked per week multiplied by 13 weeks multiplied by one half of my hourly rate (\$17.50) that represents the overtime premium I should have been paid comes to \$4,550 in actual damages, which, when doubled to account for liquidated damages, comes to \$9,100.00.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: 09 / 14 / 2023.



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Shukri Robinson